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Department of Environmental Quality
State Air Program

XL Four Star Beef Inc.

To: Bill Rogers and Thomas Krinke

Idaho Department of Environmental Quality

Boise Regional Office

From: Michael Jay Thompson

XL Four Star Beef, Nampa

PTC# P-060029

Please advise if a modification or change to our current permit is required. We would like to move forward with this project expediently due to the increased temperatures outside.

We have paid an outside engineering firm, Integrated Environmental Services Inc to perform an odor control system review. After the review, one of the recommendations was to upgrade our Quad Corp Spray Chamber Wet Scrubber to a Packed Tower Unit. This can increase our ACH from Approx. 12-13 to the recommended 20 ACH for a suitable working environment, and controlling the odors.

Very seldom do we run the Quad Corp Spray Chamber Wet Scrubber due to the inefficient design to remove the room air odors adequately by installing the more efficient Pac bed scrubber, we believe that it could be utilized more than the Quad Corp Spray Chamber Wet Scrubber, thus helping capture more of the process vapors that are present inside the Rendering facility. We do have the ability to install this without disturbing our Venturi and Pac bed scrubbing system, with the exception of a tie in date which would be a day the process facility would be inactive

We are proposing to remove the Quad Corp Spray Chamber Wet Scrubber and replace it with a 25,000 C.F.M. Pac bed Scrubber equipped with scrubbing media, mist eliminators, and high volume water nozzles. We have acquired the 25,000 C.F.M. Pac bed scrubber and the anticipated cost for this project is approximately $20,000.

In our PTC# P-060029, under rendering operations 3.2 emission control design it states that the room air is vented through the Quad Chamber scrubber to control odors. Also in section 3.5 the operating requirements state that plant ventilation air shall be

vented through the Quad Corp Spray Chamber Wet Scrubber if needed. We intend to continue to run only if needed.

In section 3.6 scrubber operating requirements 3.6.3.1. It states that the scrubbing media flow rate to the spray chamber wet scrubber shall be maintained at or above 14 GPM when in use. The Pac bed scrubber that would replace the unit will operate at or above 250 GPM through the high volume water nozzles. The chamber is 7.33 feet diameter, and 20 feet tall with stainless steel construction. It has the same counter flow design as our current 60,000 C.F.M. Pac bed wet chamber scrubber.

The sump from the 60,000 CFM Pac bed scrubber and the proposed 25,000 CFM Pac bed scrubber would be connected together to form a common sump thereby utilizing the existing CL02 or bleach system as the scrubbing medium; as defined in section 3.2.

The proposed scrubber would be monitored during operation on the same frequency as the Venturi, Pac bed and the current spray chamber wet scrubber as defined in section 3.9 monitoring and record keeping requirements 3.9.1. Once every 8 hours during production.

I would like to be advised on when I could start the installation of the new scrubber during this process. If this Physical change in equipment deems a modification to our current permit, I would request the names for the facility contacts to be updated at that time.

Bill and Tom Please call upon receiving this letter so that we can discuss any questions you may have.

Thank you Gentlemen,

Michael Jay Thompson
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